

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION FOR LEAVE TO FILE DOCUMENTS IN SPANISH

TO THE HONORABLE COURT:

COME NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows:

1. The Fourth Public Hearing and status conference in the captioned case was held on September 1st, 2016, and, September 2nd, 2016, at the Commonwealth Court of First Instance in Mayagüez, Puerto Rico. Several members of the PRPD made their testimonies with the assistance of a PowerPoint presentation.

2. In order to preserve and memorialize the historical record of the proceedings the PRPD requests that the PowerPoint presentations are made part of the record of the case as Exhibits.

3. L.Cv.R.P. 5 (g) requires that all documents not in the English language, which are presented to or filed in this Court, must be accompanied at the time of presentation or filing by a certified translation into English.

4. However, taking into consideration that the hearings were not adversarial in nature and that the content of the presentations are non-litigious, the PRPD requests leave from this Court to permit the filing of such exhibits in spanish.

5. Moreover, during the course of the hearing a certified court interpreter conducted simultaneous translation at all times; therefore, the complete historical records of the two days of proceedings were entirely in English.

6. In light of the foregoing, the PRPD respectfully request from this Honorable Court leave to file the PowerPoint presentations in the spanish.

WHEREFORE, PRPD respectfully requests that this Court grants leave to file the PowerPoint presentations in the spanish.

IT IS HEREBY CERTIFIED that on this same date the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record to their respective registered e-mail addresses.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this September 8th, 2016.

CÉSAR R. MIRANDA RODRÍGUEZ
Secretary of Justice

MARTA ELISA GONZÁLEZ Y.
Deputy Secretary
General Litigations Office

WANDYMAR BURGOS VARGAS
Director
Federal Litigation Division
Department of Justice

S/JOEL TORRES ORTIZ
Joel Torres Ortiz

U.S.D.C. NO. 302311
Federal Litigation Division
Department of Justice
P.O. Box 9020192
San Juan, P.R., 00902-0192
Tel. (787) 721-2900, ext. 2647,2650,2624,2606
Fax (787) 723-9188
joeltorres@justicia.pr.gov